

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DARIAN DEROSA,

Plaintiff,

vs.

CAC FINANCIAL CORP,

Defendant.

Case No.: 2:16-cv-01472-LDW-SIL

**REPLY DECLARATION OF
DAVID M. BARSHAY**

DAVID M. BARSHAY, pursuant to 28 U.S.C. §1746, hereby declares under penalty of perjury, as follows:

1. I am a member of the law firm of Barshay Sanders, PLLC, attorneys for Plaintiff Darian Derosa (“Plaintiff”), and submit this Reply Declaration in further support of Plaintiff’s Cross-Motion for summary judgment.

2. A true and complete copy of *Defendant’s Responses to Plaintiff’s Request for Admissions*, as received by my office, is annexed hereto as “Exhibit 1.”

3. A true and complete copy of *Defendant’s Answers to Plaintiff’s First Set of Interrogatories*, as received by my office, is annexed hereto as “Exhibit 2.”

Dated: Garden City, New York
February 2, 2017

Respectfully submitted,

s/ David M. Barshay
David M. Barshay, Esquire